

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Glenn Graff, et al.	:	CASE NO. 1:09-CV-00670
	:	
PLAINTIFFS	:	Judge Susan J. Dlott
	:	
v.	:	Magistrate Judge Karen L.
	:	Litkovitz
	:	
	:	
	:	
Haverhill North Coke Company,	:	
et al.	:	
	:	
DEFENDANTS	:	
	:	

PLAINTIFFS' MOTION FOR LEAVE TO FILE MOTION REGARDING CASE
MANAGEMENT UNDER SEAL

Plaintiffs respectfully seek leave to file under seal a motion related to case management deadlines. As set forth in the attached memorandum, the document that the Graff Plaintiffs seek leave to file under seal requires the discussion of *confidential medical information* that should be protected from public disclosure. Plaintiffs have conferred with the Defendants, and the Defendants do not oppose the filing of the motion under seal.

Accordingly, Plaintiff respectfully requests that the Court grant leave to file the deadline-related motion under seal.

s/ Nicholas W. Schwandner
D. David Altman (0021457)
Justin D. Newman (0080968)
Lawrence R. Altman (MN0135720)
Nicholas W. Schwandner (0086471)
D. DAVID ALTMAN CO., L.P.A.
15 East 8th Street, Suite 200W
Cincinnati, Ohio 45202

(513) 721-2180
daltman@environlaw.com
Trial Attorneys for the Plaintiffs

MEMORANDUM IN SUPPORT

Plaintiffs respectfully request that this Court grant Plaintiffs leave to file under seal a motion relating to case management deadlines.

Good cause exists to file the document under seal. That is, in order to explain the grounds for the requested relief, Plaintiffs must discuss confidential medical information regarding counsel and a witness — information that should not be publicly filed. Indeed, highly private individual information, including individual medical information of this type, is commonly afforded confidentiality protection. Plaintiffs have conferred with the Defendants, and the Defendants consent to the filing of the motion relating to case management deadlines under seal.

Accordingly, Plaintiffs respectfully request that they be granted leave to file the motion under seal.

s/ Nicholas W. Schwandner
D. David Altman (0021457)
Justin D. Newman (0080968)
Lawrence R. Altman (MN0135720)
Nicholas W. Schwandner (0086471)
D. DAVID ALTMAN CO., L.P.A.
15 East 8th Street, Suite 200W
Cincinnati, Ohio 45202
(513) 721-2180
daltman@environlaw.com
Trial Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2012, a copy of the foregoing *PLAINTIFFS' MOTION FOR LEAVE TO FILE MOTION REGARDING CASE MANAGEMENT UNDER SEAL* was electronically filed with the Clerk of Court using the Court's electronic filing system. Notice of this filing will be sent to all parties in the case by operation of the Court's electronic filing system, and parties may access this filing through the Court's system.

s/ Nicholas W. Schwandner
One of Plaintiffs' Attorneys